

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

PAUL SHAO

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

No.: 1:23-cv-00809

**DEFENDANT ALLSTATE INSURANCE COMPANY’S MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF PAUL SHAO’S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Defendant Allstate Insurance Company (“Allstate” or “Defendant”) respectfully requests an extension of time to file its Response to Plaintiff Paul Shao’s (“Shao” or “Plaintiff”) Motion for Partial Summary Judgment of no more than nine calendar days, or December 20, 2024. In support thereof, Allstate states as follows:

1. On November 26, 2024, Shao filed his Motion for Partial Summary Judgment. (Dkt. 158). Pursuant to Local Rule 7(F)(1), Allstate has until December 11, 2024 to file its Response to Shao’s Motion for Partial Summary Judgment.

2. Counsel for Allstate respectfully requests an additional nine calendar days to submit its Response. The drafter of the Response experienced an unexpected death in the family and will be unavailable to assist in drafting during the current response deadline. Moreover, other members of Allstate’s counsel have pre-existing business travel and vacation out of the country.

3. Counsel for Allstate reached out to Shao to request his consent to this motion, and Shao indicated he does not oppose the motion.

4. Accordingly, Allstate respectfully requests this Court extend the deadline to respond to Plaintiff's Motion for Partial Summary Judgment by nine days or December 20, 2024.

5. Allstate is making this request in good faith and not for the purpose of undue delay.

WHEREFORE, Allstate respectfully requests that this Court enter an Order: (a) extending the deadline for filing its Response to Plaintiff's Motion for Partial Summary Judgment to December 20, 2024; and (b) for any and all other relief that this Court deems proper and just.

Dated: December 5, 2024

Respectfully submitted,

/s/ Laura Seferian

Laura Seferian (Va. Bar No.: 92510)

J. Scott Humphrey (admitted *pro hac vice*)

Katie M. Burnett (admitted *pro hac vice*)

Meghan Golden (admitted *pro hac vice*)

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*Attorneys for Defendant Allstate Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th of December a copy of the foregoing *Defendant Allstate Insurance Company's Motion for Extension of Time to Respond to Plaintiff Paul Shao's Motion for Partial Summary Judgment* was emailed to:

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/s/ Laura Seferian

Laura Seferian